

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Subject: Albion-Sheridan Cap Possibilities

From: Leah Evison

*leah*

To: Gene Hall

US EPA RECORDS CENTER REGION 5



472112

I've looked farther into the Subtitle D landfill cap regs -- unfortunately, they aren't nearly as stringent as I thought. They seem to require just that the cover be as protective as the bottom, with a minimum requirement of simply 18" of clay or a bentonite mat equivalent, and 6" soil. There is some technical guidance it which I'll get next week, but I'm told it basically just describes what they mean by the idea of "what's on the bottom should be on the top". Since my recollection is that we have little to nothing on the bottom at Albion, these regs aren't very helpful...

My opinion is we need to pick a cap for the FS at Albion that's more than Subtitle D, because of the potential for hazardous wastes leaching from the landfill in the future, but I don't think a full Act 64 or Subtitle C cap makes sense either, since there is no liner on the bottom and evidently little has leached to date.

Another RPM here, Laura Evans, has recently picked a cap for the J & L Landfill, a Michigan site that might be similar to Albion, except the ground water is apparently a lot more contaminated. Attached is an MDNR evaluation she had in her file -- I forgot to ask her who the RPM is at your end. Actually I don't know yet whether the sites are similar enough to pick the same cap, but I wanted to send you something, since I am going to be out of the office all next week.

Also, do you know how readily clay is available around that part of Michigan?

Have a good Thanksgiving!